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March 4, 2004

Arizona Corporation Commission
DOCKETED

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007-2927

MAR - 5 2004

DOCKETED BY

Re: BCE Nexxia Corporation ("BCE"); Docket No. T-042000A-03-0550
Motion to Request that Michael Patten be added as Counsel to BCE
Motion to Request Waiver of Appearance of BCE Officer

Dear Sir or Madam:

BCE, by its undersigned counsel, hereby files an original plus thirteen (13) copies of its Motion to add Michael Patten as BCE's counsel in its Application to provide services in Arizona in the above referenced Docket. This Motion is being made pursuant to Rule 33(d) of the Arizona Supreme Court and pursuant to Procedural Order dated February 4, 2004.

Mr. Patten has been appointed by BCE to act as local counsel and to represent it, and will appear on BCE's behalf at the Commission Hearing on the Application scheduled for April 22, 2004 at 10:00 AM at the Commission's Offices, 1200 West Washington Street, Phoenix, Arizona 85007. Mr. Patten is licensed to practice in Arizona and his contact information is set forth below as follows:


Mr. Michael W. Patten
Roshka, Heyman & DeWulf, PLC.
One Arizona Center
400 East Van Buren Street
Suite 800
Phoenix, Arizona 85004.
Tel: 202-256-6100

BCE also makes Motion to Request Waiver of Appearance at the Hearing of BCE's witness, Mr. David C. Kidd, Vice President, Regulatory Law, and that Mr. Kidd be permitted to attend this hearing by telephone from his Offices in Montreal, Canada. Travel by Mr. Kidd at this particular juncture would serve an undue hardship.

Please file stamp and return the extra copy of this filing in the pre-addressed, stamped envelope provided for this purpose.

Should there be any questions, please contact the undersigned.

Sincerely,



William K. Coulter
Counsel for BCE Nexxia Corporation

WKC:clz

Enclosures

Cc: Christopher Kempley, Chief Counsel
Legal Division, Arizona Corporation Commission

Ernest Johnson, Director
Utilities Division, Arizona Corporation Commission

Michael Patten, Esq.
Roshka, Heyman & DeWulf, PLC.